

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHI DIVISION**

In re:	
Juan Claudio, Maria Cristina Quinones, Debtors.	Bankruptcy No. 23-11033-pmm Chapter 13 Related to Doc. No. 2
Nationstar Mortgage LLC, Movant,	
v. Juan Claudio, Maria Cristina Quinones, Debtors/Respondents,	
Kenneth E. West, Esquire, Trustee/Respondent.	

**NATIONSTAR MORTGAGE LLC'S OBJECTION TO CONFIRMATION OF
DEBTORS' CHAPTER 13 PLAN**

Secured creditor, Nationstar Mortgage LLC (“Nationstar”) by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtors, Juan Claudio and Maria Cristina Quinones, and in support thereof alleges as follows:

1. Juan Claudio AND Maria Cristina Quinones (“Debtors”) filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on April 10, 2023.
2. Nationstar holds a security interest in the Debtors’ real property located at 1238 Gilham St, Philadelphia, PA 19111 (the “Property”), by virtue of a Mortgage Recorded with the Public Records of Philadelphia County, PA on January 3, 2008.
3. Said Mortgage secures a Note in the amount of \$92,800.00.

4. Upon review of internal records, it is anticipated that Nationstar's Proof of Claim will include a pre-petition arrearage of approximatley \$860.21. A true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On April 10, 2023, Debtors filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full anticipated pre-petition arrearage of \$860.21, as it provides a total of \$0.00 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) Nationstar hereby objects to Debtors' proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

WHEREFORE, Movant, Nationstar Mortgage LLC ("Nationstar"), respectfully requests that this Court not confirm the Chapter 13 Plan of Debtors, Juan Claudio and Maria Cristina Quinones.

Date: May 19, 2023

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In re: Juan Claudio, Maria Cristina Quinones, Debtors. Nationstar Mortgage LLC, Movant, v. Juan Claudio, Maria Cristina Quinones, Debtors/Respondents, Kenneth E. West, Esquire, Trustee/Respondent.	Bankruptcy No. 23-11033-pmm Chapter 13 Related to Doc. No. 2
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 19, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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United States Trustee
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